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March 25, 1975

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Forest Service
630 Sansome Street
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Dear Mr. Leisz:

In one of your opening paragraphs to the DRAFT ENVIRONMENTAL STATEMENT Mineral King you state, "a final selection of one development plan can be made without an adequate understanding of probable effects to the natural socio-economic environment." You ask for the readers considered review and request comments.

I herewith submit my comments. First, may I give my qualifications for my judgments. Since 1935 I have spent eight to ten weeks at Mineral King during the summer. My husband and I bought our cabin at Faculty Flat in 1946. Since his death in 1971 I have continued to occupy the cabin during much of the summer. However, since I am now seventy-four years of age I have few years left to enjoy it. My family is limited by their professions to spending little time there. Therefore, I am not writing a defense to keep our cabin but rather to save the environment of Mineral King. I resent the statement on p. 181 that the "displacement of the cabins will disrupt, if not eliminate, the social interaction among those persons who have used the cabins over the years, as well as disrupting an element of their life style." This statement implies that we are contesting developments for our own selfish reasons. On the other hand, I am making a defense ~~defense~~ to preserve the natural environment of Mineral King for the use of people now and in the future who absorb and appreciate its beauty. I would favor a greater development of this use by the establishment of more campgrounds with related accommodations and an improvement of the existing road.

I feel that your report is a recommendation for the large scale commercial development of the Disney project. This has been the policy of your department since the first so-called open meeting in 1953 in Visalia at which time "no serious objections were made". As I recall this was an invitational meeting of businessmen which was not publicized. In the meantime Mr. Hicks arranged for the purchase of about twenty-three acres of private property in the Mineral King Valley for the Disney Corporation. In February 1965 the Forest Service invited proposals for the development of Mineral King. It was almost a foregone conclusion since land had already been purchased by Disney that their proposal would be accepted. The drawback to the development was the construction of a highway. In 1965 the California State Legislature approved a bill incorporating the present road into the State Highway System. The vote was taken at the close of the session when little publicity had been given and no opportunity for public expression of disapproval. Fortunately, this action was rescinded but the building of the highway to Oak Grove was retained. Now a system of cogways or a bus system is to be substituted to be paid for by the County of Tulare as far as Silver City and by the Disney Corporation from there to Mineral King.

It is to this proposition to which I must object. A private company is being given monopolistic access and control over the entire area as well as to the passes which lead to Sequoia National Park and other Natural Forests surrounding the area. The necessity of making a profit from the expenditures will necessitate prohibitive costs to the majority of the people who are in the middle and low income brackets. I doubt very much that the quoted price of the per capita transportation of \$4.30 round trip on the cogway is realistic. Even if it were it would be prohibitive to my own family. Even you say on p. 167, "These prices, not counting food and lodging, are prohibitive to the use of the proposed development by low income people and create to some extent economic barriers even to moderate income families". Again on p. 208 you state, "the cost of transportation into the valley may be prohibitive to many low income families".

This would be especially true since overnight accommodations in Mineral King would include only those who could afford the price of Disney lodging. On p. 180 you say, "most vacationers desiring to use the facilities at Mineral King who are unable to find lodging in the Mineral King Village ^{with} stay within one hour's drive of Oak Grove". This means that visitors must be acclimatized each day from an elevation of about 800 feet at Three Rivers to 7800 feet at the village and 10,000 feet at the higher levels. Even young people require more than one day for their bodies to adjust.

Campsites in the valley are eliminated in your report but you indicate that 265 new campsites will be created. However, on p. 27 you show that these campsites will be located mostly at the higher lakes not accessible to families who cannot afford the cost and inconvenience of reaching them. On p. 191 you infer that "the transfer of luggage from the bus to the cogway may affect the camping area of the Mineral King area". and yet you state on p. 91 that "the demand for camping will increase 42 percent during 1970 to 1990 and on p. 105 that "the demand for camping statewide will increase by 76 percent".

However, I would like to direct my main argument to the environmental impact.

Through-out the ~~report~~ report the destruction of the environment is justified by increasing the number of people visiting the valley each year from a few thousand to 2,835,000 when the project is completed. But the floor of the valley still remains about two miles long to one quarter mile wide.

You admit that the permanent loss of about 284 acres of vegetation and the disturbance of about 517 additional acres will alter vegetation types. p. 170 "A ten-acre area of coniferous forest will be lost in the Faculty Flat area to make way for structures proposed there." This is the site of the tallest pine trees in the state if not in the nation. Yet they are to be cut down to make way for structures.

p. 130 "Soils on the lower ski slopes have high erosion rating and would be difficult to revegetate." p. 135 "Soils, vegetation and streams and lakes are very sensitive to overuse in these areas and natural vegetation will be difficult and a long term process." And yet on p. 213 you infer that just as the damage done by a few hundred miners has been erased so also will the impact done by construction and large scale use will eventually be mitigated.

I am appalled by your discussion on p. 213, "Irreversible and Irretrievable Commitment of Resources". You simply state, "Should the time come when the proposed development is no longer wanted, the various facilities can be dismantled and the area revegetated and allowed to revert to a natural state". In the meantime Mineral King will have been strip-mined.

I am also shocked to read that the Summer Development will not substantially conflict with the purpose for which Sequoia National Game Refuge was established. The permanent loss of 284 acres of natural or near-natural wildlife habitat and the modification of about 517 acres seem inconsistent with this view.

On p. 175 "Human access to key deer fawning areas at Mineral King will be restricted during the months of May and June." These are the months when the beauty of Mineral King with the increased sunlight is at its height. Can thousands of people be restricted from visiting these areas at this time?

From the standpoint of geology a leading mining engineer has recommended that the Mineral King area be set aside as a geological museum. When the road survey was being made crows painted over the glacial polish on the rocks above Faculty Flat. Dr. Philip Leighton, former head of Physical Sciences at Stanford University, was amazed that the glacial action 10,000 years ago was erased. Much of other evidences of geological history will be destroyed by blasting for ski-runs and their accompanying facilities.

p. 97 "The development proposed for the area is incompatible with the Wilderness Act." p. 179 "The possibility of Wilderness classification at some future date will be foregone for any part of Mineral King which may now qualify." p. 207 "The Wilderness classification will be lost." I cannot agree with you on p. 189 that "the increase in summer use at Mineral King will not adversely affect the wilderness use of Sequoia National Park." We sacrifice our Wilderness to man-made structures.

Much of the justification for this sacrifice is the economic impact it will have on Tulare County with a population of only 200,000, until recently classed as a depressed area. In fact, the county wields an undue influence over the development. To me the public park and forest lands belong to all of the people of the United States. The few people living in adjoining areas should not be considered any more than people in more distant parts. Why should public lands at Mineral King be developed by a private corporation to benefit its stockholders and the people of Tulare County economically?

I regret that I must write my adverse opinions. I am saddened that the Forest Service which did so much in its beginning to reduce the over-grazing of lands in my native Arizona now seems to have changed its policies from protection to exploitation of public lands under its guardianship.

Very truly yours

Marvel W. Benedict